

Hearing Date: May 20, 2010
Hearing Time: 10:00 a.m. (prevailing Eastern time)

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
155 North Wacker Drive
Chicago, Illinois 60606
John Wm. Butler, Jr.
John K. Lyons
Ron E. Meisler

- and -

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
Four Times Square
New York, New York 10036
Kayalyn A. Marafioti

Attorneys for DPH Holdings Corp., et al.,
Reorganized Debtors

DPH Holdings Corp. Legal Information Hotline:
Toll Free: (800) 718-5305
International: (248) 813-2698

DPH Holdings Corp. Legal Information Website:
<http://www.dphholdingsdocket.com>

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----	x	
	:	
In re	:	Chapter 11
	:	
DPH HOLDINGS CORP., <u>et al.</u> ,	:	Case No. 05-44481 (RDD)
	:	
Reorganized Debtors.	:	(Jointly Administered)
	:	
-----	x	

REORGANIZED DEBTORS' RESPONSE TO
PLEADING FILED BY PAUL C. MATHIS

DPH Holdings Corp. and certain of its affiliated reorganized debtors in the above-captioned cases (collectively, the "Reorganized Debtors"), hereby submit this Response To Pleading Filed By Paul C. Mathis and respectfully represent as follows:

Response

1. On October 8 and 14, 2005 (the "Petition Dates"), Delphi Corporation ("Delphi") and certain of its subsidiaries and affiliates (collectively, the "Debtors"), predecessors of the Reorganized Debtors, filed voluntary petitions under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1330, as then amended (the "Bankruptcy Code"), in the United States Bankruptcy Court for the Southern District of New York (the "Court").

2. On October 6, 2009, the Debtors substantially consummated the First Amended Joint Plan Of Reorganization Of Delphi Corporation And Certain Affiliates, Debtors And Debtors-In-Possession, As Modified (the "Modified Plan"), which had been approved by this Court pursuant to an order entered on July 30, 2009 (Docket No. 18707), and emerged from chapter 11 as the Reorganized Debtors.

3. On April 21, 2010, Paul C. Mathis filed a pleading (Docket No. 19899) (the "Pleading").

4. The Reorganized Debtors have reviewed the Pleading but it is unclear what relief Mr. Mathis is seeking.

5. Mr. Mathis has previously filed proof of claim number 8058 and proof of administrative expense claim number 20074 (collectively, the "Claims").

6. The Debtors objected to proof of claim number 8058 and the claim was disallowed and expunged by this Courts' Order Pursuant To 11 U.S.C. § 502(b) And Fed. R. Bankr. P. 3007 (I) Expunging (A) Certain Pension And OPEB Claims, (B) Certain Individual

Workers' Compensation Claims, (C) Certain Duplicate And/Or Amended Individual Workers' Compensation Claims, (D) An Untimely Individual Workers' Compensation Claim, (E) A Secured Books And Records Claim, and (F) Certain Untimely Claims, (II) Modifying Certain (A) Wage And Benefit Claims, (B) State Workers' Compensation Claims, And (C) Individual Workers' Compensation Claims Asserting Priority, (III) Provisionally Disallowing Certain Union Claims, And (IV) Modifying And Allowing Certain Settled Claims Identified In The Thirty-Fourth Omnibus Claims Objection (Docket No. 18637) entered on July 24, 2009.

7. The Debtors objected to proof of administrative expense claim number 20074 and the claim was disallowed and expunged by this Court's Order Pursuant To 11 U.S.C. § 503(b) And Fed. R. Bankr. P. 3007 To (I) Expunge Certain Administrative Expense (A) Severance Claims, (B) Books And Records Claims, (C) Duplicate Claims, (D) Equity Interests, (E) Prepetition Claims, (F) Insufficiently Documented Claims, (G) Pension, Benefit, And OPEB Claims, (H) Workers' Compensation Claims, And (I) Transferred Workers' Compensation Claims, (II) Modify And Allow Certain Administrative Expense Severance Claims, And (III) Allow Certain Administrative Expense Severance Claims (Docket No. 19590) entered on March 4, 2010.

8. Other than the filing of the Claims, the Reorganized Debtors are unaware of any other involvement of Mr. Mathis in these cases.¹

9. Mr. Mathis also filed the Pleading in In re Motors Liquidation Company (Case No. 09-50026) at Docket No. 5535, and Judge Robert E. Gerber denied the motion, sua sponte, at Docket No. 5539 for failure to show prima facie entitlement to relief. See Exhibit A.

¹ The Reorganized Debtors also identified three other letters submitted by Mr. Mathis (Docket Nos. 9514, 14438 and 14549) that relate to his Claims.

Because it is manifestly unclear what relief, if any, Mr. Mathis is seeking from this court as to the Reorganized Debtors, the Reorganized Debtors respectfully request that this Court enter an order on the same grounds.

WHEREFORE the Reorganized Debtors respectfully request that this Court enter an order (a) denying the relief requested in the Pleading and (b) granting the Reorganized Debtors such other and further relief as is just.

Dated: New York, New York
May 13, 2010

SKADDEN, ARPS, SLATE, MEAGHER
& FLOM LLP

By: /s/ John Wm. Butler, Jr.
John Wm. Butler, Jr.
John K. Lyons
Ron E. Meisler
155 North Wacker Drive
Chicago, Illinois 60606

- and -

By: /s/ Kayalyn A. Marafioti
Kayalyn A. Marafioti
Four Times Square
New York, New York 10036

Attorneys for DPH Holdings Corp., et al.,
Reorganized Debtors

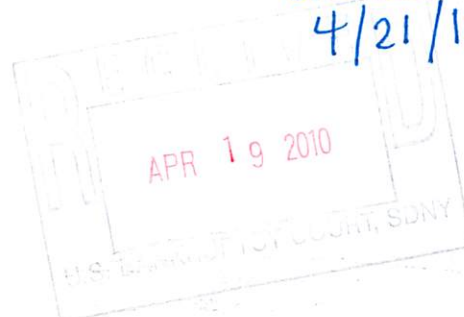
EXHIBIT A

Endorsed Order:

*Motion denied without
prejudice, for failure to
show a prima facie
entitlement to relief.*

*S/ REG
USBJ
4/21/10*

United States Bankruptcy Court
Southern District of New York
Delphi Corporation Claims
One Bowling Green
Room 534
New York, New York 10004-1408



UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re

DELPHI CORPORATION, et al.,
CADILLAC FISHER BODY (FLEETWOOD GMC)
MET LIFE INSURANCE CO Debtors.
-SEDWICK INSURANCE CO.
DEFENDANT(S) RESPONDENTS
JOINTLY AND SEVERALLY

Chapter 11

Case No. 05-44481 (RDD)

(Jointly Administered)

(05-50026)

*Doc #
19899*

-# 5535

DEAR CLERK, Please time Stamp the attached Petition, and return
a Copy to Me in the Self Address envelope enclosed

Paul C. Mathis
Respectfully,

Paul C. Mathis
42416 Brownstone dr.
Novi, Mi 48377

AFFIDAVIT IN SUPPORT

CASE. 09-50026

STATE OF MICHIGAN)
OAKLAND COUNTY) ss

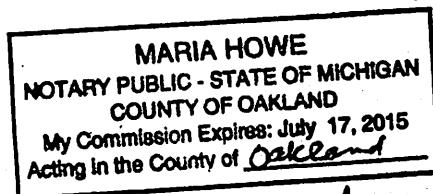
09-50026

I paul C. Mathis being duly sworn according to law, hereby swears
due to poverty his pleadings cannot be filed electronically before the
court which is indicia from the record.

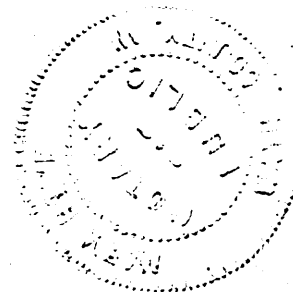
SUSBCRIBED AND SWORN TO BEFORE ME, *Paul Mathis*

THIS 31st DAY OF *march* 2010

X *Paul C. Mathis*



Maria Howe



NOTICE BY MAIL

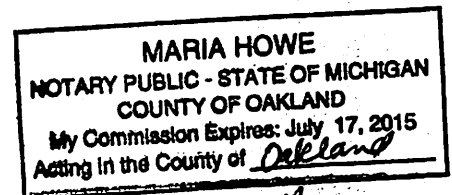
US ATTORNEY'S OFFICE/ATTN: DAVID S. JONES. ESQ AND MATTHEW L. SCHWARTZ ESQ
S.D.N.Y. 86 CHAMBERS STREET THIRD FLOOR, NEW YORK, NEW YORK, 10007
HON. ROBERT E. GERBER US BANKRUPTCY JUDGE, ROOM 621 SOUTHERN DISTRICT OF
NEW YORK, NEW YORK, ONE BOWLING GREEN, NEW YORK, NEW YORK 10004-1048
WEIL, GOTSHAL & MANGES LLP, 767 FIFTH AVENUE, NEW YORK, NY 10153
GARDEN CITY GROUP, INC, GM CLAIMS AGENT, P.O. BOX 9386 DUBLIN OH 43017
LAWRENCE BUONOMO ESQ GENERAL MOTORS CORP, DETROIT, MI 48226
KURTZMAN CARSON, 2335 ALASKA, EL SEGUNDO CA 90245
MET LIFE INSURANCE CO, ONE MADISON AVENUE NY 10010 (HOURLY CLAIM).
SEDWICK INSURANCE CARRIER FOR GENERAL MOTORS CORP, PO BOX 14607 LEXINGTON
KY 40512-4607
MATTHEW FELDMAN ESQ, U.S. TREASURY DEPT 1500 PENNSYLVANIA AVE, NW, ROOM
2312 WASHINGTON DC 20220
DIANA G. ADAMS ESQ, 33 WHITALL STREET 21 FLOOR OFFICE OF UNITED STATES
TRUSTEE FOR THE SOUTHERN DISTRICT OF NEW YORK, NY 10004
MICHEAL J. EDELMAN ESQ AND MICHEAL SCHEIN ESQ ATTORNEY FOR CREDITOR CMTE
1633 BROADWAY 47 FLOOR, NEW YORK, NY 10019

ALL OF THE ABOVE PERSONS WILL BE SERVED BY UNITED STATES MAIL

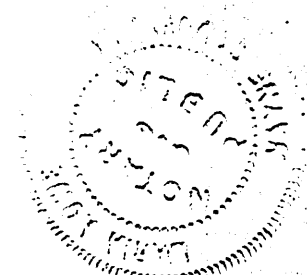
SUBSCRIBED AND SWORN TO BEFORE ME,

NOTARY PUBLIC, THIS 31st DAY March 2010

x Paul C. Mathis



Maria Howe



UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT COURT OF NEW YORK
IN THE MATTER OF: CASE 05-44481
PAUL C. MATHIS , PETITIONER 09-50026
INTER ALIA
ALL PERSONS SIMARILY SISUATED

V CADILLAC FISHER BODY(FLEEWTOOD GMC)
GENERAL MOTORS/DELPHI CORPORATION
MET LIFE INSURANCE CO (HOURLY)
SEDWICK INSURANCE CARRIER FOR GENERAL MOTORS(WORKERS DISABILITY)
JOINTLY AND SEVERALLY ET AL, .
DEFENDANT(S) RESPONDENTS)

NOTICE FOR HEARING

TO: HON. ROBERTE. GERBER
UNITED STATES BANKRUPTCY JUDGE
COURTROOM 621 ONE BOWLING GREEN
NEW YORK, NY 10004

PLEASE TAKE NOTICE, THAT A HEARING WILL BE HELD IN THE COURTROOM
OF THE HONORABLE .ROBERT E. GERBER, ON THE ATTACHED PETITION FOR REMAND
TO THE DEPARTMENT OF JUSTICE OR A JURY TRIAL ORDERED .

AS SOON AS THE HONORABLE COURT DOCKET WILL PERMIT ACCORDING TO LAW, FOR
THE PETITION TO BE HEARD NOT TO EXCEED (90) DAYS.

FURTHER, ALL PARTIES WILL BE NOTICE ON THE ATTACHED AFFIDAVIT

MOTION FOR RECONSIDERATION

BEFORE UNITED STATE JUDGE
BANKRUPTCY COURT TORT. CLAIM (CIVIL)
ON CONSENT AGREEMENT .

CASE 05-44481 (JOINERS)
09-50026

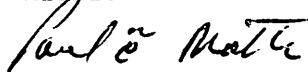
TO: HON ROBERT E. GERBER
COURTROOM 621 ONE BOWLING GREEN
NEW YORK, NEW YORK 10004

THE DECISION OF THE TRIAL COURT IS AGANIST
THE GREAT OF EVIDENCE.

THE DECISION OF THE TRIAL COURT IS CLEARLY ERRONEOUS

THE DECISION OFF THE TRIAL COURT IS A MANIFEST INJUSTICE

RESPECTFULLY SUBMITTED



PAUL C. MATHIS

42416 BROWNSTONE DR.

NOVI MI 48377

4/ 3/10

UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT COURT OF NEW YORK

IN THE MATTER OF:	Case 05-44481
	09-50026
PAUL C. MATHIS inter alia	Erisa 1974 Sec. § 3000
	HUMAN RIGHTS VIOLATIONS
ALL PERSONS SIMARILY SISUATED	28U.S.C. § 139(a)
OBLIGEE/ PETITIONER	11 U.S.CA § 1132(a)(1)(B)

VS

CADILLAC FISHER BODY(FLEETWOOD GMC)
GENERAL MOTORS/DELPHI CORPORATION
MET LIFE INSURANCE CO
SEDWICK INSURANCE CO FOR GENERAL MOTORS(WORKERS DISABILITY UNIT
JOINTLY AND SEVERALLY ET AL
DEFENDANTS/OBLIGOR

TO: HON. ROBERT E, GERBER
UNITED STATES BANKRUPTCY JUDGE
COURTROOM 621 ONE BOWLING GREEN
NEW YORK, NY 10004

JURY DEMAND
FEDERAL RULES CIVIL PROCEDURE RULE 5)d)

NOW COMES Paul C. Mathis who moves the honorable Court on the above
entitled cause for a Jury Trial

TO WIT:

This matter dates July 27, 2007 where defendant(s) Agent entered into a
Consent Agreement. from that dat of more than (4) years this matter has been
tossed from judge to judge, in all that time; defendants have made NO attempt
file an reponse to Petitioners demand for Payment of this Claim(Exhibit 1A).


It appears that the only way to properly adjudicate this matter is to
have a Jury Trial on the Merits of this cruel and unusual matter is for a
jury too decide it "this is a political matter"

KNOWLEDGE IS POWER, AND A SLAVE TO THE TRUTH !

DEFAULT JUDGMENT BY DEFENDANTS 837 F. Supp 1312; 22 F,3rd at 27-28

Defendant(s) have NOT filed a response; in over (4) Years
it's unclear, how the Court could allow them to file anything in this
matter see Santos v Murdock, 243 F3rd 681, 683(2d Cir 2001). Defendant(s)
have yet, to prove that no issue of genuine fact; as to why the Judgment
has NOT been Satisfied to this date; every law or statute holds that every
day that the judgment has not been satisfied then every day thereafter is
the first day of the judgment entered by the Court 137 N.W 2d 845, 847
Erisa Act of 1974 § 3000 infra also compells the Court to order a Jury
Trial in this matter; this is a matter of Health and Welfare no to be taken
lightly by the Judicial System 28 U.S.C. § 1331; Demery v Extenbank Deferred
Compensation Plan, 216 F3rd 286, 290(2d Cir 2000); 42 U.S.C. § 2000-E-28 U.S.C.
1346(a)(1)-26 U.S.C. § 1 see also green v Montgomery 219 F3rd 52.55(2d Cir 2000

Further there is no remedies to exhaust in this case Constitutional
protection does not fade with time; it only shows that justice is grossly lacking
Lee v Habib, 424 F.2d 891(DC Cir 1970); CF Pattern v DEnnis, 134 F2d 137, 138(9th
(Cir 1943 46 A.2d 137, 141 of Terry 274-482 a.2d at 464 for the reason and more
the Court must, in the interest order a Jury Trial in this Matter forthwith.
see 105 P.2d 342,345- 42 U.S.C. § 1983 Cole v General Motors, 641 F.Supp 28
Cases cited for relief for Paul C. Mathis(a Contract is legal and binding
if this Court looks closer; it will find that defendants certification of no
objection has NO merit on its face , laws on satisfied judgment control!



Paul C. Mathis
42416 Brownstone Dr.
Novi Mi 48377

STARE DECISIS

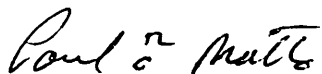
(HEARING HELD) THE AWARD JUDGMENT IS OPEN: AND THIS IS ONE OF THE REASONS IT'S OPEN
QUESTION HOW DOES SOCIAL SECURITY EFFECT FURTHER COMPENSATION PAYMENTS

. . . if respondents had paid the judgment that still runs legally on
the judgment of 1990 workers disability claim; Court Ordered modification
(Exhibit 1A) was Never paid on the Order, When Defendant(s) Agent saw that
Paul C. Mathis had no Counsel for some time. I geuss, they said to there self
why pay this, he, can;t possibly no how to attack us oh no

Court have been handling colateral attack on judgment some examples
Webb v Hass 1999 Me 74,-5 728 A.2d 1261; cook v Cook, 574 A.2d 1353(Me 1990);
Morse Bros,. Inc. v Webster, 2000 Me 70-14, 772 A2d 842

Assuming that the court reasonable;. . . for the judgment to be closed
the Claim; would have too be Satisfied, no such paper exist, and prior Counsel
COULD NOT . . . Knowingly Waive for Mr. Mathis, Where the Constitutional
Protection exist Only Mr. Mathis can waive such a Right . Further, Defendant(s)
are subject to that Order for Modification, and the effects of Retroactive
Application. for manny reasons the court must remand this cause to the
department of justice, or order a Jury Trial!

Justice Say No More



Respectfully Submitted

Paul C. Mathis
42416 Brownstone Dr.
Novi mi 48377

CONCLUSIVE EVIDENCE

. . . CONCLUSIVE EVIDENCE void of smoke no illusions by the mere circumstances a preponderance of the evidence: riddled in this Soap Opera (Exhibit 1A). The law agrees with Paul C. Mathis see Mc Cormick on Civil matters at 793 (2d ed). 1972 of like purport 21 So. 2d 878, 880 that by the evidence; here is evil, hardships, void of law of justice it's said, NO one is bigger than the LAW, is that true Petitioner ask Justice; what Amendment is that?

TRUTH SPOKEN DEFENDANTS AGENT: Where the Consent Agreement Made

on the Proofs: Undisputed Claim of \$415,969.62

for a payment of \$428,448.71

Petitioner sign Mailed Papers(Contract) back to Defendants Agent(Contract Joiners). (Exhibit 1 A).

Justice Says No More

Respectfully Submitted



Paul C. Mathis
42416 Brownstone Dr.
Novi, Mi 48377

(J)
LIQUIDITY SOLUTIONS, INC.
One University Plaza, Suite 312
Hackensack, NJ 07601
Tel: (201) 968-0001 Fax: (201) 968-0010

Exhibit 1A

July 27, 2007

Paul C Mathis
17265 Coral Gables St
Southfield, MI 48076-4784

Consent Agreement

Attn: Accounting Dept. /Collections

RE: **DELPHI CORPORATION et AL**
Jointly Administered Case No. 05-44481
(US Bankruptcy Court, Southern District of New York)

Dear Creditor:

We are writing you to express an indication of our interest in your allowed and undisputed claim of \$415,969.62 for a payment of \$428,448.71. This indication is valid through August 10, 2007 and is subject to further due diligence and mutually agreeable documents of transfer.

This indication of interest is on a first come first serve basis. This may be rescinded for any reason whatsoever without further notice or obligation from either party. We are not responsible for typographical errors.

If you are interested in offering your claim, please sign twice on the last page where indicated and return the two page (agreement) to us.

Contract Established By Law Legal Duty

Sincerely,

Please find necessary signature (Paw) 09

on form enclosed

Jim Yenzer

Thank you
Paul C Mathis

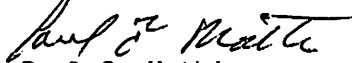
Jim Yenzer
jyenzer@liquiditysolutions.com

1. K.

RELIEF SOUGHT

Wherefore the Court being advised in this matter, Petitioner
request the relief sought in the attached Petition
for a Jury Demand or other relief on remand to the United States
Department of Justice Civil Rights Disability Department
on the proofs submitted in this Cause.

Respectfully Submitted


Paul C. Mathis

42416 Brownstone Dr.

Novi , Mi 48377

COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>X <i>C. Williams</i></p>	
<p>1. Article Addressed to:</p> <p><i>EEOC Commission</i> <i>1801 E Street</i> <i>Washington, D.C.</i> <i>20507</i></p>		<p>B. Received by (Printed Name) <i>C. Williams</i></p> <p>C. Date of Delivery <i>2-5-07</i></p>	
<p>2. Article Number <i>7006-0100000182730803</i></p> <p>(Transfer from serv/co label)</p>		<p>D. Is delivery address different from Item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If YES, enter delivery address below:</p>	
<p>3. Service Type</p> <p><input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	
<p>PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540</p>			

UNITED STATES POSTAL SERVICE		SOUTHERN MD 207	
<p>05 FEB 2007 PM 2 1</p>		<p>First-Class Mail Postage & Fees Paid USPS Permit No. G-40</p>	
<p>• Sender: Please print your name, address, and ZIP+4 in this box •</p> <p><i>Mr. Paul E. Metter</i> <i>17265 Coral Gables</i> <i>Southfield, MI 48076</i></p>			
<p>0015</p>		<p>Model 1-29-2007 Post Marked</p>	